

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CLOUDING IP, LLC,

Plaintiff,

v.

EMC CORPORATION, *et al.*,

Defendants.

C.A. No. 13-1455-LPS

**PLAINTIFF CLOUDING IP, LLC’S OPPOSITION TO  
DEFENDANTS’ MOTION TO BIFURCATE**

Defendants EMC Corp., EMC International U.S. Holdings, Inc. and VMware, Inc. (“Defendants”) have joined with defendants in the related cases *Clouding IP, LLC v. Google Inc.*, C.A. No. 12-639-LPS, *Clouding IP, LLC v. Motorola Mobility LLC*, C.A. No. 12-1078-LPS, *Clouding IP, LLC v. Amazon.com, Inc. et al.*, C.A. No. 12-0641-LPS, and *Clouding IP, LLC v. Rackspace Hosting Inc. et al.*, C.A. No. 12-675-LPS to Bifurcate Damages from Liability and to Stay Damages-Related Fact and Expert Discovery.

For the convenience of the Court and to reduce burden on the Court, Clouding IP, LLC (“Clouding”) incorporates by reference the briefs in opposition to each of the motions to bifurcate. (C.A. No. 12-639-LPS at D.I. 122, C.A. No. 12-1078-111, C.A. No. 12-0641-LPS at D.I. 133, and C.A. No. 12-675-LPS at D.I. 138.) The additional facts provided by Defendant do not change the calculus for denying the request for bifurcation of damages and liability discovery.

January 6, 2014

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